

28th August 2015

By email to: consultations.co-ordinator@dh.gsi.gov.uk

ADCS response to the Department of Health consultation: *Local authority public health allocations 2015/16: in-year savings*

1. The Association of Directors of Children's Services Ltd (ADCS) is the professional association for directors of children's services (DCS) and their senior management teams. Under the provisions of the Children Act 2004, the DCS is the chief officer responsible for the discharge of local authority functions with regard to education and children's social care and champion for children across wider children's services.
2. ADCS welcomes the transfer of responsibilities for 0-5 children's public health commissioning from NHS England to local authorities. The prevention and early intervention services within the Healthy Child Programme (HCP) fit closely with the range of other early help services provided by local authorities.
3. While ADCS does not have a view on the options put forward by the Department of Health (DoH) as to how to make the required savings, it is deeply concerned that funding for the commissioning of 0-5 public health services has been deemed within scope of this exercise. Local authorities have put in place arrangements for the commissioning of these services to ensure the transfer of responsibilities is seamless. The lateness of this announcement is unhelpful considering many local authorities have already committed the funding they expected to receive as part of the transfer of functions from NHS England.
4. Public health prevention and early intervention services are key to laying the foundations for lifelong health and wellbeing for both children and their families. Any reduction in investment in such services is concerning for our members who believe this will result in poorer outcomes and greater demand for more intensive and costly support for children, young people and families.
5. In the March 2015 document '*Transfer of 0-5 children's public health commissioning to local authorities*', the DoH stated "*local authorities will be expected to provide the same level of service as the NHS.*" ADCS members are keen to stress that it will be extremely difficult for local authorities to continue to meet the five mandated elements of the HCP in light of a reduced allocation. DoH also stated that it would ensure the transfer of functions would not impose an additional unfunded burden upon local authorities. Clearly, if local authorities are expected to continue to deliver the mandated elements of the HCP with a reduced level of funding, this a new and unacceptable burden.
6. If the DoH maintain that the 0-5 public health allocation is within scope of the reduction in funding, it must realign its expectations with regard to the mandated elements of the HCP. The five HCP mandated elements should be withdrawn to ensure local authorities have maximum flexibility when considering how best to meet local needs.

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